

From:

Lisa M Anderson

June 30, 2006

Send to:

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)

Re: Business Opportunity Rule, R511993

600 Pennsylvania Avenue, NW

Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am a Regional Vice President and an Arbonne Independent Consultant. I have been with Arbonne for 8 Months. Arbonne has been a wonderful and life changing business opportunity for me and my family. I have been able to pull myself out of terrible financial debt and also help my Mom avoid foreclosure on her house. I have been able to help my brother a single Dad to a five year old daughter, by being there for her because I can set my own work hours. I have also grown as a person by gaining self confidence and business skills through the free training that Arbonne has to offer.

I have witnessed so many lives change because of this home-based business opportunity. Many of my friends are single Moms and are able to provide for their children and be at home and spend quality time with them. Arbonne has made it possible for me to not only improve the quality of my life, but to help empower others and do the same for them.

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business. I am so saddened by this, and I'm afraid for my future.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for only 8 months and I have loved every second of it. I became a Consultant because I love the products and me and my family was in need of a second source of potential income. Since starting my Arbonne business, I have developed a team of over 20 Independent Consultants across the country and together we are helping our families enjoy better lives. Several of my Consultants now work full time with Arbonne and it is their only source of income.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Lisa M Anderson